

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Laurie Ortolano,)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:22-cv-00326-LM
)	
The City of Nashua, <i>et al.</i> ,)	
Defendants.)	
_____)	

**DEFENDANT KIMBERLY KLEINER’S ASSENTED-TO MOTION TO EXTEND TIME
FOR FILING REPLY TO OBJECTION TO SUMMARY JUDGMENT—REPLACES
DOC 106**

Defendant Kimberly Kleiner (“Kleiner”) brings the within assented-to motion to extend the time to file her Reply to Plaintiff’s Objection (Doc 102) to Kleiner’s Motion for Summary Judgment (Doc 86), pursuant to L.R. 7.2(a), and as grounds therefore states as follows:

1. Defendant Kimberly Kleiner filed her Motion for Summary Judgment on May 30, 2024. [Doc 86].
2. Plaintiff filed her Objection on July 1, 2024. [Doc 102].
3. Kleiner’s Reply is therefore due on or before July 8, 2024. (L.R. 7.1(e)(1)).
4. Kleiner seeks a brief three-day extension, until July 11, 2024, to file her Reply due to the upcoming Fourth of July holiday weekend and undersigned counsel’s vacation over that time frame.
5. Counsel for Plaintiff assents to the requested extension.
6. Pursuant to L.R. 7.2(a), the extension will not result in the continuance of any hearing, conference or trial dates.
7. A memo of law is not required as the Court has discretion to grant the requested relief.

8. This document replaces Doc 106 which inadvertently listed the incorrect extension date as July 8 instead of July 11 which all assent to.

WHEREFORE, Defendant Kleiner respectfully requests this Honorable Court:

- A. Grant the within motion;
- B. Extend Kleiner's Reply deadline to on or before July 11, 2024; and
- C. For such other just relief.

Kimberly Kleiner
By her attorneys,
FRIEDMAN FEENEY, PLLC,

Date: July 2, 2024

By: /s/ Dona Feeney
Dona Feeney, NH Bar #12854
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served through the court's electronic filing system on to all counsel or parties of record.

Date: July 2, 2024

By: /s/ Dona Feeney
Dona Feeney